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LETTER OF COMMENT NO. 24

May 8, 2009

Technical Director – File Reference No. 1690-100
Financial Accounting Standards Board
401 Merritt 7
P.O. Box 5116
Norwalk, Connecticut 06856-5116

Re: Exposure Draft Proposed Statement of Financial Standards, *The Hierarchy of Generally Accepted Accounting Principles*, (a replacement of FASB Statement No. 162).

Dear Technical Director:

In connection with the Exposure Draft Proposed Statement of Financial Standards, *The Hierarchy of Generally Accepted Accounting Principles*, a replacement of FASB Statement No. 162, the “Exposure Draft” or “ED”, Mayer Hoffman McCann P.C. (“MHM”) appreciates the opportunity to express its views regarding certain matters related to the adoption of the Exposure Draft by the Financial Accounting Standards Board (the “Board”). Our observations relate primarily to the timing of the effective date of the ED which is July 1, 2009. We believe the Board’s primary goal of simplifying user access to authorized GAAP and therefore potentially easing compliance with GAAP has been met by the FASB Accounting Standards Codification and we laud the Board for its efforts. However, we are concerned that the effective date as currently proposed may be too soon for many financial statement issuers to become adequately prepared for what will certainly be a significant change from prior research and reporting practices.

The past year has been extremely eventful for virtually all businesses that routinely prepare financial statements under U.S., Generally Accepted Accounting Standards. The economic crisis has produced obvious business challenges while at the same time creating a variety of accounting and financial reporting issues. Many of these challenging issues have continued into 2009 with no real end in sight. In 2009 financial reporting continues to be significantly impacted by new and changing standards related to fair value measurements. For those companies that did not have significant financial instruments, 2009 will be their first significant encounter with Statement No. 157, *Fair Value Measurements*, as they begin to evaluate long-lived assets for impairment. It is also likely that Statement Nos. 141R and 160 will have a significant impact on financial reporting during 2009. Upon adoption of the ED, issuers of financial statements will



Technical Director
Financial Accounting Standards Board
May 8, 2009
Page 2

have to become familiar with the Codification in order to replace the references to prior GAAP with appropriate Codification references. Although we agree with the Board that these are not necessarily substantive changes, it is our expectation that the process will be time consuming for many companies. All of this change is being addressed by companies with fewer and fewer qualified accountants as a result of economic downturn. Again, we understand the Board does not believe that GAAP has been changed as a result of the Codification and therefore does not expect a significant challenge to financial reporting practices; however, it appears to us that many financial statements preparers have simply not been able to invest the necessary time to make July 1, 2009 a viable adoption date. For these reasons we believe the Board should defer the effective date currently proposed in the ED to January 1, 2010.

Sincerely,

Mayra Hoffman McLane P.C.